

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION**

In re:	)	
	)	Chapter 11
AEARO TECHNOLOGIES LLC, et al., <sup>1</sup>	)	Case No. 22-02890-11-JJG-11
	)	
Debtors.	)	(Jointly Administered)
	)	

**MOTION TO APPEAR *PRO HAC VICE***

Kevin D. McCullough of Rochelle McCullough LLP (the “Applicant”) moves the Court for an order granting admission *pro hac vice* for the purpose of appearing as (proposed) bankruptcy counsel on behalf of the Additional Official Committee of Unsecured Creditors for Tort Claimants – Related to Use of Respirators (“Respirator Committee”) in the above-styled cause only. In support of this motion, the Applicant states:

1. The court(s) in which I am admitted to practice and the date(s) of admission are as follows:

Court(s)	Date(s) of Admission (month/year)
State of Texas	November 1993
U.S. District Court for the Northern District of Texas	January 1994
U.S. District Court for the Southern District of Texas	November 1995
U.S. District Court for the Eastern District of Texas	November 1995
U.S. District Court for the Western District of Texas	November 1997

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are set forth in the *Debtors’ First Day Motion for Entry of an Order (I) Directing Joint Administration of Chapter 11 Cases and (II) Granting Related Relief* [Docket No. 7]. The location of the Debtors’ service address for the purposes of these chapter 11 cases is: 7911 Zionsville Road, Indianapolis, Indiana 46268.

2. I am not currently under suspension or subject to other disciplinary action with respect to the practice of law.
3. Attached hereto as **Exhibit A** of this motion is an affidavit, as required by S.D. Ind. L.R. B-9010-2.

WHEREFORE, the Applicant requests this Court enter an order of admission *pro hac vice* for purposes of this cause only.

Dated: August 30, 2022

Respectfully submitted by:

/s/ Kevin D. McCullough  
Kevin D. McCullough (*Pro Hac Vice* pending)  
Rochelle McCullough, LLP  
325 North Saint Paul St., Suite 4500  
Dallas, Texas 75201  
Telephone: (214) 580-2525  
Facsimile: (888) 467-5979  
Email: kdm@romclaw.com

PROPOSED BANKRUPTCY COUNSEL FOR  
THE RESPIRATOR COMMITTEE

### **CERTIFICATE OF SERVICE**

The undersigned counsel hereby certifies that a copy of the foregoing Motion to Appear *Pro Hac Vice* was served via the Court's electronic noticing system on the 30<sup>th</sup> day of August, 2022.

/s/ Kevin D. McCullough  
Kevin D. McCullough